

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**BISOUS BISOUS LLC,**

*Plaintiff,*

**v.**

**THE CLE GROUP, LLC,  
BISOU UPTOWN MANAGER, LLC, and  
BISOU LP HOLDINGS, LLC,**

*Defendants.*

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**C.A. No. 3:21-cv-01614-B**

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**JOINT MOTION TO CONTINUE STAY**

As communicated to the Court previously, Plaintiff Bisous Bisous LLC and Defendants have reached a settlement in principle that will dispose of all claims and defenses asserted by all parties in this action. (Doc. 91.) The parties have made substantial progress since we last wrote to the Court and need additional time to finalize their agreement. They expect to file a joint motion to dismiss with prejudice all claims and counterclaims within the next 30 days. Accordingly, the parties respectfully request to continue the current stay for an additional 30 days.

This motion is not submitted for delay, but to accommodate and facilitate a final settlement between the parties.

Date: January 12, 2022

Respectfully submitted,

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By: /s/ Kenneth P. Kula

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service and are being served with a copy of this document via the Court's CM/ECF systems on this 12<sup>th</sup> day of January, 2022.

/s/ Kenneth P. Kula  
Kenneth P. Kula